
NOTICE AND ORDER INITIATING PROCEEDING
TO CONSIDER MODIFICATIONS TO MARKET DOMINANT
SERVICE PERFORMANCE MEASUREMENT PLAN
Docket No.

PI2022-3

**COMMENTS OF THE
NATIONAL ASSOCIATION OF PRESORT MAILERS
(May 18, 2022)**

The National Association of Presort Mailers (NAPM) respectfully submits these comments on the United States Postal Service's Notice of Filing Changes to Service Performance Measurement Plan Document, PI2022-3, dated April 22, 2022.

The NAPM is comprised of mail service providers, mail supply chain vendors and mail owners. Our mail service provider members act as the “facilitators” that enable businesses to use the USPS’ products and services easier and cheaper with better customer experience and USPS service performance. Our members work within the mail owner company’s departments (accounting/billing, marketing, customer relations, and more) to inform them about USPS’ products/services and educate them on how they can accomplish their business objectives through using the mail. Our members provide “total solution capabilities,” from printing, packaging, addressing, integrating omni-channel solutions, tracking, and more to enable the mail user to attain the greatest value mail offers them for their communications, business transactions, integrated marketing, and eCommerce business needs. Our members produce the most cost effective, efficient, and profitable mail for the USPS by commingling mail from multiple business customers into streamlined IMb Full-Service or Seamless mailings that help reduce the USPS’ costs, provide them with extensive mail data to support a host of USPS programs and services, and more.

Our members act as liaison between the customer and the USPS for many areas, particularly that of service performance. Our members enable the mail tracking, provide the USPS with the data that supports the Service Performance measurement system, provide visibility data and reports, provide training and customer support to businesses using the mail on service related issues, and they work closely with the USPS to investigate and resolve service issues on behalf of their customers.

In addition, the business rules around service performance measurement, including those that dictate when the “clock” starts for measurement purposes, are critically important to NAPM members.

Critical Entry Times (CETs), Customer Supplier Agreements (CSAs) and other mechanisms which the business rules define and use to determine start-the-clock are integral to our members' ability to process and enter as much streamlined mail as possible to the USPS each day while ensuring mail is entered in time to meet USPS transportation cut offs. Entering mail as late as possible allows NAPM members to process more mail into commingled streamlined barcoded mailings with IMb Full-Service and Seamless Acceptance requirements met, which brings more mail into the USPS service performance measurement system and enables visibility of that mail to the USPS, mail service providers and businesses using the mail.

Our members interact with tens of thousands of commercial mail consumers. USPS service performance is critically important to these users of the mail, many of which have regulatory and legal constraints around when their mail must be entered and desired delivery dates, as well as those utilizing mail for marketing campaigns with associated activities timed around anticipated delivery. As postage rates continue to increase and some service standards have been changed, anything that helps improve service performance and measurement becomes even more important to users of the mail.

Our below comments are offered as a collaborative business partner with the USPS, as well as valued liaisons and service providers to businesses using the mail.

I. Long Haul and Start-the-Clock

NAPM commends the Postal Service for working collaboratively with the mailing industry and with those mail service providers utilizing long haul entry of First-Class Mail, many of which are NAPM members. For years FCM entered via long haul has been excluded from service performance measurement and this represents a significant volume of First-Class Mail. We support the USPS and industry efforts to work on solutions to allow this mail to be included in measurement. We believe that most of this mail is able to achieve good service performance, partly due to its bypassing some USPS processing operations, and including this mail in measurement is likely to result in increased USPS service performance scores for First-Class Mail.

We continue to encourage the USPS to work with industry on other solutions that could bring more mail into measurement. When mail is excluded from measurement it not only drops out of the USPS service performance measurement system and therefore can lead to performance scores that do not represent a significant portion of mail in that category, it also means that there is no USPS visibility to this mail as it moves through its network. Having no visibility means this mail can't be tracked and service issues can't be investigated and resolved. NAPM regularly hears from members

about service issues with a customers' mail and in working to resolve those issues there are times when little can be done because the mail was not included in measurement and therefore there is little visibility around its movement within the USPS network. In addition to bringing more mail into measurement to make the overall reporting and measurement system more accurate and reflective of real service performance experienced by users of the mail, it is also critical to provide mailers with the tools and data necessary for them to investigate and resolve service issues. To that end, mailers should have access to piece level data for mail excluded from measurement through Informed Visibility reporting, which is not currently available.

II. Inclusion of Reply Mail in Service Performance Measurement

NAPM commends the USPS for working to bring reply mail into service performance measurement. When MTAC Workgroup 114 initially worked back in 2006 to provide recommendations to the USPS around modern service standards and performance measurement, it had recommended that reply mail be separately measured and reported by the USPS. Reply mail has characteristics that differentiate it from other First-Class Mail as it moves through the USPS network, and the service performance experienced by reply mail pieces does not always mirror that of other First-Class Mail pieces. NAPM supports having reply mail included in measurement, but suggests that breaking out the measurement and reporting of reply mail as a separate category be considered.

III. Revision to CETs for Periodicals

NAPM is concerned with the USPS' proposed revisions to Critical Entry Times (CETs) for Periodicals. We are not attempting to speak for Periodicals mailers, since few NAPM members mail Periodicals, but we are concerned with the USPS' rationale for the proposed changes. The USPS argues that

“Periodical mailings currently have as many as five different CETs, depending on the nature of the mailing and the facility. Having so many different CETs is overly complicated and results in both inefficient mail processing operations and inconsistent, unreliable service. The implementation of a more uniform CET applicable to all Periodicals and facilities will promote simplification of mail processing operations, and hence more efficient allocation and use of processing and sorting equipment. The Postal Service anticipates that this initiative will improve service performance for Periodicals.”

NAPM does not agree that the fact that there are different CETs based on mail preparation and entry characteristics is “overly complicated,” or that it “results in both inefficient mail processing operations

and inconsistent, unreliable service.” Many mail categories, including First-Class Mail and Marketing Mail, have a variety of different CETs based on the level of mail preparation and entry characteristics of the mail. The USPS has been using this type of CET differentiator for some years, which supports the fact that mail that is more finely presorted and entered to facilitate USPS processing and transportation can have a later Critical Entry Time (CET) than mail that is not optimally prepared.

As noted earlier in our comments, NAPM members pick up mail from business customers throughout the day, bringing it to their plant for sortation, barcoding and more to enhance the value of the mail and be able to present it to the USPS as one streamlined IMb-Full Service mailing that also meets Seamless Acceptance requirements. The later the CET at the USPS plant, the more mail NAPM members can process in this fashion, which benefits the USPS by having more mail that is more finely presorted, containerized, and meets IMb Full-Service requirements so the data can be included in service performance measurement.

The “data rich” streamlined mailings provided to the USPS through programs such as IMb Full-Service and Seamless Acceptance continue to be the foundation for a long and growing list of USPS initiatives designed to add value to mail, retain mail volume, reduce USPS’ costs, and increase USPS efficiency. From Informed Delivery marketing campaigns, to Service Performance Measurement and diagnostic tools to improve service, to election mail tracking, Informed Visibility, Surface Visibility, and Mailer Scorecard data to drive mail quality improvements, and much more – all rely on the data only mailers can provide with their Streamlined Mail production and processing capabilities. These data-rich capabilities provide benefits to all users of the mail and to the USPS, but they do not come without costs. So working collaboratively with mailers to provide the most flexibility possible with CETs and mail entry while still ensuring USPS transportation deadlines are met results in the most streamlined mail and mailing data provided to the USPS.

As long as the CET established by the USPS meets its critical transportation needs, having different CETs for different levels of mail preparation should not impact processing efficiency. If the USPS is proposing changes to Periodicals CETs to reflect new transportation cut offs, then it should state that in its proposal. Changing CETs purely because the USPS feels they are “complex” is not a rationale that NAPM supports, and we are concerned with the precedent the argument represents.

IV. Conclusion

In closing, NAPM appreciates the work the USPS and the PRC are doing to bring more mail into service measurement and improve the service performance measurement system and reporting. We urge the PRC and the USPS to consider the issues we have raised around Critical Entry Times

(CETs) and we continue to support the USPS and industry efforts to bring more mail into measurement.

NAPM members continue to desire to work with the USPS collaboratively on innovative and new approaches to our mutual challenges. Our success is inextricably linked as we all depend on retaining and growing mail volumes.

The NAPM appreciates the Commission's consideration of these comments.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Robert Galaher", written in a cursive style.

/s/

National Association of Presort Mailers
Robert Galaher, Executive Director and CEO
PO Box 3552
Annapolis, MD 21403-3552 www.presortmailer.org
eMail: bob.galaher@presortmailer.org
Phone: (800) 500-6276